

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RYAN ANDERSON, et al.)	
)	
Plaintiffs,)	
)	
v.)	17-cv-07691
)	
FERRELL ROBINSON d/b/a F. J.)	Honorable Judge Andrea R. Wood
ROBINSON'S CONTRACTING INC.)	
and d/b/a F. J. ROBINSON)	
CONTRACTING, INC.,)	
Defendant.)	

JOINT CERTIFICATION TO DEFER INITIAL DISCOVERY DEADLINE

Pursuant to the Court's Standing Order Regarding Mandatory Initial Discovery Pilot Project, the parties hereby certify that they are attempting to settle the case and have a good faith belief that it will be resolved within 30 days of the due date for their responses. In support of this certification, the parties state as follows:

1. Plaintiffs filed their Complaint to compel an audit and to collect delinquent employee benefit fund contributions, union dues, and assessments disclosed by the audit on October 24, 2017.
2. Defendant Answered the Complaint on January 24, 2018.
3. Accordingly, the parties' mandatory initial discovery responses are due on February 23, 2018.
4. The parties have exchanged preliminary information and are attempting to reach a resolution of Plaintiffs' claims without further Court involvement. Specifically, Defendant has agreed to submit to an audit and is in the process of providing requested records to the Plaintiffs' auditor.

5. The parties have a good faith belief that, by March 26, 2018, they will have resolved all or a substantial part of Plaintiffs' claims.

WHEREFORE, the parties respectfully request that the deadline to provide mandatory initial discovery responses be deferred by 30 days, to March 26, 2018.

Dated: February 22, 2018

Respectfully submitted,

/s/ Charles Burns

Charles Burns

One of the Attorneys for Plaintiffs

/s/ Bryan M. Kaemmerer

Bryan M. Kaemmerer

One of the attorneys for Defendant

Marisel Hernandez

Charles Burns

Jacobs Burns Orlove & Hernandez

150 N. Michigan Avenue, Suite 1000

Chicago, IL 60601

Phone: (312) 372-1646

Fax: (312) 726-3887

cburns@jbosh.com

mhernandez@jbosh.com

Bryan M. Kaemmerer

McCarthy, Leonard & Kaemmerer, L.C.

825 Maryville Centre Drive

Town and Country, MO 63017

(314) 392-5200

bkaemmerer@mlklaw.com

CERTIFICATE OF SERVICE

I, Charles Burns, an attorney, certify that on February 22, 2018, I filed the foregoing ***Joint Certification to Defer Initial Discovery Deadline*** electronically with the Clerk of Court using the CM/ECF system, which shall provide notification by email of such filing to all counsel of record.

/s/ Charles Burns
Charles Burns